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Article Number: 7000 0520 0023 6937 5605

Mr. Geoff Jones
Corporate Project Manager
Safety-Kleen Corporation
P.O. Box 11393
Columbia, South Carolina 29211

Dear Mr. Jones:

RE: Safety-Kleen-Wichita
EPA ID# KSD007246846

As we discussed in our February first meeting, I asked the Regions Data Integration and Support Services Branch to review the QAPP in your Phase I Investigation Workplan. They reviewed the subject document, dated October 14, 1999, for compliance with the *EPA Requirements for Quality Assurance Project Plans for Environmental Data Operations*, EPA QA/R-5, November 1999 (R5). The subject document references an Interim Final RCRA Facility Investigation Guidance which in turn references the original QA requirements document: Interim Guidelines and Specifications for Preparing Quality Assurance Project Plans, EPA/QAMS-005/80, December 1980 (QAMS)

Because the work has already begun, EPA is providing comments relative to the potential vulnerabilities of the data collected under this document. Comments are structured with the reference to the subject document, to R5, and to QAMS, followed by the issue or concern. By updating your QAPP, questions about data validity for future work will be minimized.

Comments

1. Table 5: Soil samples according to the SW-846 Methods, Chapter 3, Methods 6000-7000 do not require acidification as a preservation. However, water samples for manganese do require acidification. The reason for acidifying the soil samples but not the water samples should be clarified.

ARTD/RCAP:BLOWE:LH:X7658:3-5-01:qapp comment letter
RCAP
LOWE

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   A. Were the methods used for the analyses during the 1986-1990 period the same as the analyses during the 1994-1997 period?

   B. What were the method detection limits (MDLs) for each analysis?

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   E. Why were analyte data not consistently collected for each location?

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3. Section 3.5.3, page 11: In the second paragraph the plan describes water levels being less than 10 feet, while in the fourth paragraph Safety-Kleen predicts water levels from 12-14 feet. This discrepancy should be corrected.

4. Section 6.2, page 30: This section states "...soil impacts will be compared to levels that are protective of groundwater based on USEPA and/or KDHE guidelines." Provide a table Which has the soil to groundwater screening limits. Make sure that the analytical MDL's are below the groundwater protection limits.

5. Section 6.3, page 30: The second bullet discussed coding outlier data. Table 4 lists the samples, most of which are biased. Define a "statistical outlier" with biased data. EPA QA/G-9, the guidance on data quality assessment indicates that elimination of outliers from biased data severely skews the results.

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The remaining comments are deficiencies based on the QAMS document

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Sincerely

William F. Lowe, RPG
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Air, RCRA, and Toxics Division

cc: Ms. Kay Tauscher, Safety-Kleen Inc.
Christine R. Jump, Kansas Department
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cc: Ms. Kay Tauscher, Safety-Kleen Inc.
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1. Article Addressed to:

Mr. Geoff Jones
Corporate Project Manager
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P.O. Box 11393
Columbia, SC 29211

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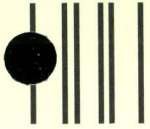

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***Recipient's Name** (Please Print Clearly) (To be completed by mailer)*
Mr. Geoff Jones, Corporate Proj. Mgr.

Street, Apt. No.; or PO Box No.
Snfety-Kleen Corp., P.O. Box 11393

City, State, ZIP+ 4 Columbia, SC 29211

PS Form 3800, February 2000 See Reverse for Instructions